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VIA ECFS

October 24, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Petition of 800 Response Information Services LLC for Emergency Declaratory Relief, or, in the Alternative, Petition for Further Rulemaking*, CC Docket No. 96-115

Dear Ms. Dortch:

This letter is in support of 800 Response Information Services LLC's ("800 Response") Petition for Emergency Declaratory Relief, or, in the Alternative, Petition for Further Rulemaking ("Petition")¹ in the above-referenced docket.

Windstream Services, LLC ("Windstream") agrees with 800 Response that recent moves by several carriers to refuse to share even "coarse" location data for toll-free calls initiated by their customers, block telecommunication carriers from interconnecting with location databases, or impose burdensome "double consent" requirements for such data to be shared, would significantly "impede the ability of toll-free service providers to route calls to the correct termination points as specified by their customers" ² The ability to access accurate and complete location data is essential for many toll-free service customers to be able to provide quality, location-specific services to callers.

¹ See generally *Petition of 800 Response Information Services LLC for Emergency Declaratory Relief, or in the Alternative, Petition for Further Rulemaking*, CC Docket No. 96-115 (filed Oct. 10, 2018) ("Petition").

² *Id.* at 5.

Furthermore, as explained by 800 Response in its Petition, such actions may contravene Sections 222 and 251 of the Communications Act of 1934.³

Windstream therefore urges the Commission to either issue a declaratory ruling pursuant to the stipulations outlined 800 Response's Petition,⁴ or, in the alternative, initiate a rulemaking proceeding so that the Commission can gather feedback from interested parties and define the requirements pertaining to, and obligations of, wireless carriers with respect to the sharing of location data. In the meantime, consistent with the Petition, Windstream requests that the Commission require such carriers to refrain from imposing new obligations to obtain the consent of dialing parties to use their location information in relation to toll-free services.⁵

Sincerely,

/s/ Thomas Whitehead

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³ See *id.* at 6-10.

⁴ See *id.* at 11.

⁵ *Id.*